



indicate that Stone's statement is incorrect. I spoke with counsel for two of the listed service providers, and in both cases they denied the existence of such an "agreement." On July 7, 2011, I spoke by telephone with Sarah B. Deutsch, Vice President and Associate General Counsel for Verizon Communications, who indicated that she was unaware of any agreement between Stone and Verizon regarding discovery in this case. Similarly, on July 7, 2011, I spoke by telephone with Randy Cadenhead, Privacy Counsel for Cox Communications. He also denied the existence of any discovery agreement between Stone and Cox Communications.

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct to the best of my knowledge and belief. Executed July 7, 2011, in San Francisco, California.

DATED: July 8, 2011

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MATTHEW ZIMMERMAN